

ADULTS AT RISK POLICY



Shrewsbury Town Football Club (STFC) are committed to safeguarding of vulnerable adults. The club expects all staff, players, volunteers, participants, contractors and guests to share this commitment. The policy is designed to promote the development of good practice and stresses the responsibility of all, to be alert to early indicators of abuse, neglect and exploitation and to act quickly when there is any concern regarding the welfare or safety of an adult at risk.

We will fully promote the wellbeing and safety of vulnerable adults who are participating in our Academy, Foundation or matchday at The Croud Meadow. Any suspicions and/or allegations of abuse will always be taken seriously and responded to swiftly and appropriately.

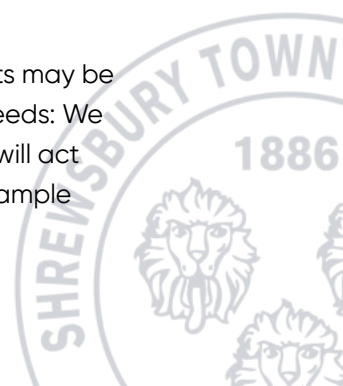
The safeguarding children policy and procedure, for those under the age of 18, is covered in a separate document.

- All children, young people and vulnerable adults that engage with us, regardless of age, culture, social background, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to safety and protection from abuse or harm
- All suspicions, reports and/or allegations of abuse will be taken seriously and investigated thoroughly which may involve the appropriate Local Authority teams where necessary

PRINCIPLES & VALUES

We promise to collect, process, store and share your data safely and securely, by ensuring:

- All adults, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment
- STFC will seek to ensure that our sport and any other recreational activities are inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review
- The rights, dignity and worth of all adults will always be respected
- We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, in particular those adults with care and support needs: We all have a shared responsibility to ensure the safety and wellbeing of all adults and will act appropriately and report concerns whether these concerns arise within STFC, for example inappropriate behaviour of a coach, or in the wider community



- All allegations will be taken seriously and responded to quickly in line with the STFC allegations against staff policy. To ensure that coaches, parents, participants, staff, players, and other adults who come into contact with vulnerable adults provide good role models for behaviour
- Promote high ethical standards throughout STFC

REGULATIONS

STFC are governed by the legislation and rules and regulations set out by key governing agencies including the Government, EFL and Football Association. The policy has been developed to complement the Local Safeguarding Adults Board policy and procedures. The communication of STFC with the Local Authorities is centred upon supporting STFC with: reporting/monitoring of Safeguarding incidents, sharing of best practice, sharing information/ changes in legislation, sharing of important local area information and workforce best practice and training and development and any other relevant appropriate Safeguarding support. The Policy also takes the following legislation into consideration:

- The Care Act 2014
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- The Human Rights Act 1998
- The Data Protection Act 1998

ROLES & RESPONSIBILITIES

Head of Safeguarding:

- Provides effective leadership and management with a clear sense of direction and purpose in the safeguarding of children, ensuring full compliance across STFC, Premier League rules and government legislation, whilst maintaining key stakeholder relationships both externally and internally
- Is accountable for the day-to-day case management of new and ongoing safeguarding concerns, including investigations works with external safeguarding partnerships and the Disclosure and Barring Service
- Is the recognised point of contact for those wishing to raise concerns or seek help and guidance connected with Safeguarding



Designated Safeguarding Officer (DSO):

- Support STFC Head of Safeguarding to pro-actively promote and raise safeguarding awareness and assist with responding appropriately to safeguarding concerns and allegations
- Work with STFC Head of Safeguarding to implement and promote safeguarding policies and procedures across all department
- Act as a source of safeguarding support and advice within their department
- Promote a safe working environment
- Support colleagues to respond appropriately to concerns about the welfare or safety of children
- There are posters and leaflets around STFC with details of the Head of Safeguarding and Designated Safeguarding Officers. These details are provided to staff, parents and young people via our information leaflets.

WHO DOES THIS POLICY AIM TO PROTECT?

This policy is written to protect adults at risk of harm who engage with STFC in any capacity. This could be:

- Adults at risk who are employed by the club in any capacity
- Adults at risk participating in events, activities or sessions organised by the Club or Community Programme
- Adults at risk attending the club or Academy as spectators
- Adults at risk who are visiting the Stadium, Academy, or Training Ground for events/tours

When someone who has needs for care and support is at risk of or experiencing abuse or neglect and you are unable to protect yourself, the Council and or partners has a duty to talk to you about what should be done to keep you safe. When a safeguarding concern is raised it may be a worrying time for you. Sometimes the solution may be straight forward and may not require a considerable amount of support, whereas other situations may require more conversation and potentially meetings.

If you do not have anyone to help you in your situation the Council will appoint someone for you. This will be an independent advocate and they will help get your views and wished across.



WHO IS AN ADULT AT RISK?

An Adult at Risk is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support. An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time. Labelling groups of people (such as people with learning disabilities or older people) as inherently 'vulnerable' is seen to be disempowering so, instead, the Care Act (2014), describes adults 'potentially 'at risk' from harm or abuse' by those who do not have their best interests at heart.

DEFINITION

The Care Act 2014 defines adult safeguarding as protecting an adult's:

Right to live in safety, free from abuse and neglect.

Safeguarding should balance the right to be safe with the right to make informed choices, while at the same time making sure that the adult's wellbeing is promoted including, taking into consideration their views, wishes, feelings and beliefs in deciding on any action. Health and social care organisations have particular responsibilities, but every worker has a part to play.

Specific Care Act safeguarding enquiry duties (section 42) applies to an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs)
- is experiencing, or at risk of, abuse and neglect and:
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

The Care Act Statutory guidance goes into considerable further detail and can be found by clicking on the following the link:

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

CATEGORIES OF ABUSE

Physical Abuse

Intentionally causing bodily injury to another person. Although not an exhaustive list, this may include assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing as well as other acts such as inappropriate or unlawful use of restraint, forcible feeding or withholding food, restricting movement, making someone purposefully uncomfortable (e.g. opening a window and removing blankets).

Possible indicators:

- Unexplained injuries
- Frequent injury and/or injuries inconsistent with the person's lifestyle or account of what happened
- Visible marks on the body e.g. bruises, cuts, burns
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition



Emotional Abuse

Behaviour that involves attempting to generate fear into another person, humiliating them, controlling them and/or isolating them. Amongst other behaviours, it may include behaviour such as intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, enforced isolation and preventing expression of choice.

Possible indicators:

- Quiet or changed behaviour in the presence of a particular person
- Withdrawal or change in the psychological state including signs of distress: tearfulness, anger and/or low self-esteem.
- Insomnia
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain

Domestic Abuse

Domestic abuse may include any of the types of abuse above that happen within a range of relationships not only between couples but also other familial relationships and between ex- partners. It often also includes coercion and control whereby an individual is undermined, threatened, humiliated and their liberty or freedom restricted or removed. Also encompassed within the category of Domestic Abuse is so called 'honour'-based violence, female genital mutilation and forced marriage.

Possible indicators:

- Low self-esteem
- Self-blaming
- Physical injury
- Humiliation in front of others
- Fearing what would happen and the consequences if outside agencies intervened
- Isolation – not seeing friends and family
- Restricted access to funds and personal property

Information on domestic and sexual abuse services in Shropshire can be found by calling Sexual Health Services – Shropshire on 300 404 2996.

Sexual Abuse

This type of abuse relates to sexual behaviour or acts forced upon a person without their consent. This could include (as well as attempted) rape, sexual assault, inappropriate touching, any sexual activity that the person lacks the capacity to consent to, indecent exposure, as well as other behaviours. It may also include sexual relationships between adults where one is in a position of trust, power or authority in relation to the other.

Possible indicators:

- Bruising on the body, particularly in areas such as thighs, buttocks and upper arms and neck
- Torn, stained or bloody underclothing
- Trauma to the genital area, infections or sexually transmitted diseases
- Pregnancy when unable to consent • Significant changes in sexual behaviour, attitude, or use of explicit language
- Poor concentration, withdrawal, sleep disturbance
- Fear/apprehension of, or withdrawal from, relationships
- Fear of receiving help with personal care



Financial/Economic Abuse

This may include having money or material belongings stolen, being a victim of fraud, or being pressured or coerced in relation to money or belongings and having these misused by another person, being prevented from accessing own money or assets, exploitation of a person's money or assets, e.g. using a person's car without authorisation.

Possible indicators:

- Missing possessions
- Unexplained lack of money or unexplained withdrawal from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person lacks the capacity to make the decision or failure to register an LPA
- The person nominated to manage financial affairs is uncooperative
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Inconsistencies between living conditions and financial resources

Organisational Abuse

This is when poor practices within a setting providing health or social care such as a care home, hospital or care agency, leads to harm to a person. This could be in relation to ongoing maltreatment or one-off incidents.

Possible indicators:

- Preventing the involvement of or visits from family and/or friends
- Lack of leadership and supervision
- Unsafe staffing levels
- Abuse and disrespect or ignoring abusive behaviour/inadequate response
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Not providing adequate food and drink, or assistance with eating
- Not offering choice, promoting independence or person-centred care
- Misuse of medication
- Ignoring different cultural or religious needs

Neglect

Neglect relates to a persistent failure to meet the needs of an individual who is being cared for. This may include their physical and/or emotional needs. It may also include withholding things necessary for life such as medication, food, suitable accommodation amongst other things.

Possible indicators:

- Lack person-centred care and choice for people using the service
- Inadequate staffing levels leading and poor standards of care
- Not allowing an individual their personal items
- Inadequate record-keeping
- Person receiving no visitors
- No or few activities
- Lack of confidentiality
- Not maintaining dignity and privacy during bathing or using the toilet



Self Neglect

This is when an individual is unwilling to, or unable to, meet their own essential needs. Self-Neglect may present itself in a number of different ways from neglecting personal hygiene to hoarding.

Possible indicators

- Unhygienic or poor cluttered environment
- Poor physical health and may have pressure sores or ulcers
- Change of appetite and weight loss/gain
- Injury and/or medical conditions untreated
- Inconsistent or reluctant contact with medical and social care organisations

Hate Crime

Abuse stemmed from bias and prejudice around protected characteristics e.g. age, race, religion, gender or gender identity, disability as well as other differences.

Possible indicators

- The support on offer does not take account of the person's individual needs
- Withdrawal or change in the psychological state including signs of distress and anxiety
- Tearfulness, anger and/or low self-esteem

Modern Slavery

Modern slavery takes many forms. The most common are:

- Human trafficking. The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit for purposes such as forced prostitution, labour, criminality, marriage or organ removal
- Forced labour; Any work or services people are forced to do against their will, usually under threat of punishment
- Debt bondage/bonded labour. The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt
- Descent-based slavery (where people are born into slavery). A very old form of slavery, where people are treated as property, and their 'slave' status has been passed down the maternal line
- Child slavery: When a child is exploited for someone else's gain, this can include child trafficking, child soldiers, child marriage and child domestic slavery
- Forced and early marriage: When someone is married against their will and cannot leave - most child marriages can be considered slavery
- Domestic servitude: Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people



County Lines

The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children, Young People and Adults at Risk. Gangs recruit Children, Young People and Adults at Risk through deception, intimidation, violence, debt, bondage and/or grooming. Gangs also use local property as a base for their activities and this often involves taking over the home of an Adult at Risk who is unable to challenge them.

Cuckooing

Cuckooing is when gangs establish a base in the location, they are targeting for drug dealing and to operate their criminal activity from, often taking over the homes of adults at risk by force or coercion. People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. Victims of 'cuckooing':

Possible indicators:

- are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single mums and those living in poverty, victims may suffer from other forms of addiction, such as alcoholism
- If you don't want to speak to the police directly, you can call the anonymous Crimestoppers charity on Tel: 0800 555 111

Abuse of positions of trust (Sexual Offences Act, 2003):

As set out by the Sexual Offences Act (2003), abuse of position of trust covers the following situations: sexual activity with a child; causing or inciting a child to engage in sexual activity; sexual activity in the presence of a child; causing a child to watch a sexual act. These situations relate to offences being committed online, via social media or text messages.

Concerns around radicalisation and extremism:

The Counter Terrorism and Security act places a duty on specified authorities, including sport in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). There is also a duty on local authorities to ensure there is a Channel Panel in place. This must include the local authority and senior police officers. The panel will assess to what extent identified individuals are vulnerable to being drawn into terrorism. The Act requires partners of the Channel Panel to cooperate with the panel in the carrying out of its functions and the police in undertaking the initial assessment as to whether a referral is appropriate. Any concerns or queries regarding this should be discussed with the DSO as the designated lead for PREVENT.

The PREVENT strategy:

Responds to the ideological challenge we face from terrorism and aspects of extremism and the threat we face from those who promote these views:

- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.



The Counter Terrorism & Security Act (2015):

This Act places a duty on specified authorities including schools, Further and Higher Education, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). At STFC, we are committed to supporting vulnerable people through our safeguarding policies and procedures and recognise that this will support our contribution to the PREVENT duty.

At STFC, we build people's resilience to radicalisation by promoting fundamental British values and enabling our pupils to challenge extremist views.

Possible Indicators (The list below is not exhaustive and the presence of one or more of these indicators is not proof that abuse is taking place though they are indicators that abuse may have taken place):

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if on a part of the body not normally prone to such injuries
- An injury for which the explanation seems inconsistent
- Disclosure of what appears to be an abusive act
- Disclosure of unsatisfactory home circumstances i.e. domestic abuse, drugs and alcohol misuse, mental health concerns of a parent or other person within the home
- Someone expresses concern about the welfare of the child
- Unexplained changes in behaviour (e.g. becoming quiet, withdrawn or sudden outbursts)
- Oversexualised behaviour
- Displays variations in eating patterns including overeating or loss of appetite

Remember: It is not the responsibility of staff (permanent or casual) or volunteers to decide if abuse has taken place, but it is their responsibility to act on any concerns, in accordance with this procedure.

Persons in a Position Of Trust:

Where a person aged 18 or over is in a specified position of trust with a young person under 18, it is an offence in certain circumstances for that person to engage in sexual activity with or in the presence of that young person, or to cause or incite that young person to engage in or watch sexual activity even if the young person appears to consent.

Therefore, given this principle, STFC expects that:

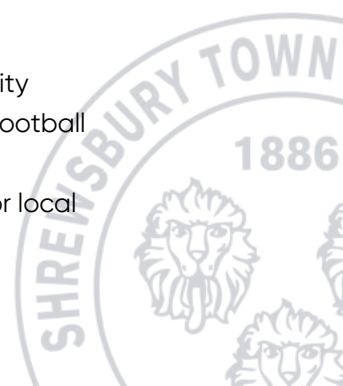
- Any behaviour, which might allow a sexual relationship to develop between the person in a position of trust and the child or young people in their care, must be avoided
- Any sexual relationship within a position of trust relationship is not allowed so long as the relationship of trust continues

Responding to Allegations or Suspicion:

All staff, volunteers and players have a responsibility to ensure the safety and welfare of children and to take appropriate steps to ensure that suspicions and allegations of abuse are taken seriously and responded to quickly and appropriately. It is not the responsibility of anyone within the Club to decide whether or not child abuse has taken place. Appendix 3 shows the procedure to follow if you have a concern about the behaviour of someone involved in football towards a child.

Where there is a complaint against a member of STFC staff the one of the following may occur:

- A criminal investigation led by the police
- A child protection investigation led in a multi-agency approach by the Local Authority
- A disciplinary or misconduct investigation led by STFC, which may also involve The Football Association or Premier League
- STFC will delay an internal disciplinary or misconduct investigation while a criminal or local authority investigation takes place



If a member of staff suspects abuse is taking place, or a report/allegation of abuse has been disclosed to them, where possible the Designated Safeguarding Officer should be contacted as early as possible. However, it is recognised that an individual may need to respond to a situation immediately and prior to such contact if the nature of the suspicion or report is putting the child concerned in immediate danger. The Designated Safeguarding Officer will notify the LADO and consult with the police and local authority children's social care as appropriate. Useful contact details are listed as Appendix 1.

The following guidelines offer help and support in responding to abuse or a suspicion of abuse:

Staff should:

- Listen carefully rather than question the child directly
- Stay calm and not offer their personal opinions/thoughts
- Be aware that medical or criminal evidence may be relevant
- Tell the child that you are listening and taking what they say extremely seriously
- Seek medical attention if necessary
- Take further action – they may be the only person in a position to prevent future abuse
- Inform the Designated Safeguarding Officer of the information or another senior member of staff if these are not available
- Using Appendix 2, write down everything said (in their words as far as possible) and what was done – accuracy and detail is important: keep this information stored in a secure place – concerns can be recorded on the Safeguarding reporting form



WHO CAN I TALK TO?

You can talk to any person who works at STFC, or you can contact:

John Rhodes

Head of Safeguarding, Shrewsbury Town FC
safeguarding@shrewsburytown.co.uk

Liam Dooley

Chief Executive Officer and Senior Safeguarding Manager
liam.dooley@shrewsburytown.co.uk

Jayne Bebb

Club Secretary and HR
jayne.bebb@shrewsburytown.co.uk

Russ Teece

Vetting & Disclosure
russ.teece@shrewsburytown.co.uk

Lawrence Ellerby

Stadium Manager
lawrence.ellerby@shrewsburytown.co.uk

Natalie Wood

Academy Player Care Lead
playercare@shrewsburytown.co.uk

Shin Aujla

Foundation Director, Shrewsbury Town FC Foundation
shin.aujla@foundationstfc.co.uk

Calvin Lord Latham

Education Manager, Shrewsbury Town FC Foundation
calvin.latham@foundationstfc.co.uk

Your information is only shared with people who need to know to keep you safe. Anything you tell us will be stored securely.



OTHER SUPPORT AVAILABLE

FA Case Management Team – Duty Manager 0800 083 5902

FA County Welfare Officer – safeguarding@shropshirefa.com

DSO for EFL Trust – Tara Lawson 07964905652

PFA: Tel: 07500 000 777 <https://www.thepfa.com/wellbeing>

KEY WIDER SAFEGUARDING CONTACTS /HELPLINE CONTACTS

British Transport Police (non- emergency) www.btp.police.uk www.police.uk/contact/101 101 0800 405040.

PFA: Tel: 07500 000 777 <https://www.thepfa.com/wellbeing>

SAFEGUARDING TRAINING

STFC will ensure there are qualified and designated individuals within the organisation that will take the lead on ensuring that we do all we can to meet our statutory and moral obligations.

A Safeguarding induction is provided for all new starters, including full time, part time and casual members of staff. This induction is provided by Department Managers. More specific training is given to people based on their job role and the need of the person delivered by the DSO.

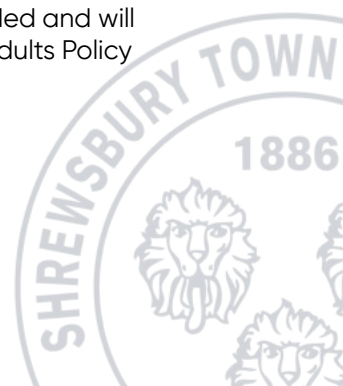
All staff working in direct contact with children are required to complete the FA's three-hour Safeguarding Children Awareness Workshop and undertake a refresher course at least once every three years. Details of satisfactory completion are held on the SCR which can be accessed by STFC DSO and the HR team.

Bi-annual training is provided to all staff as part of their own CPD and monthly updates are provided to all staff through the Staff Newsletter. Following the release of new legislation that will have an impact on any work being carried out by STFC, the DSO will ensure that all personnel are made aware of this and that it is incorporated into ways of working.

RECRUITMENT

STFC have a specific safer recruitment policy which sets out in detail the process we will undertake in ensuring staff are suitable to work with children and adults at risk. A copy is available if required.

All staff will undertake a specific safeguarding and safer working practices induction upon employment. A briefing document and guidance for safer working practices will be provided and will also be available on the network. Key elements of the STFC Safeguarding Children and Adults Policy are discussed in more detail if the role requires it.



DISCLOSURE AND BARRING SERVICE

Staff in roles that require contact with children, young people and vulnerable adults will undergo enhanced DBS disclosure, which is an on-going procedure throughout the association with STFC. Enhanced DBS checks will enable STFC to undertake more thorough recruitment and selection procedures for positions which involve working with children. Staff working in other roles may be subject to Criminal Record Checks dependant on the role being undertaken and in line with guidance produced by the FA and EFL.

POLICY LINKS

This policy should be read in conjunction with the following policies:

- Whistle-Blowing Policy
- Anti-Bullying Policy
- Safer Recruitment Policy
- IT and social media Policy
- Equal Opportunities Policy
- Late Collection of Children Policy
- Complaints Policy
- NCA Sexting in Schools and Colleges
- Prevent Policy
- Safeguarding Adults at Risk Policy
- Health and Safety Policy
- Trips, Tours, and Tournaments Policy



SAFEGUARDING CONCERN FORM

Accident: Incident: Safeguarding:

Concern:

Club: Academy: Foundation:

Date of concern:

Name, date of birth and details of the person(s) the report is being made about:

Account of incident or concern:

(give clear details relating to what happened, where, when, who was involved, what was said, nature of injury or behaviour, any witnesses etc keep it factual).

Action taken:

Name of person making report:

Signed:

Date:

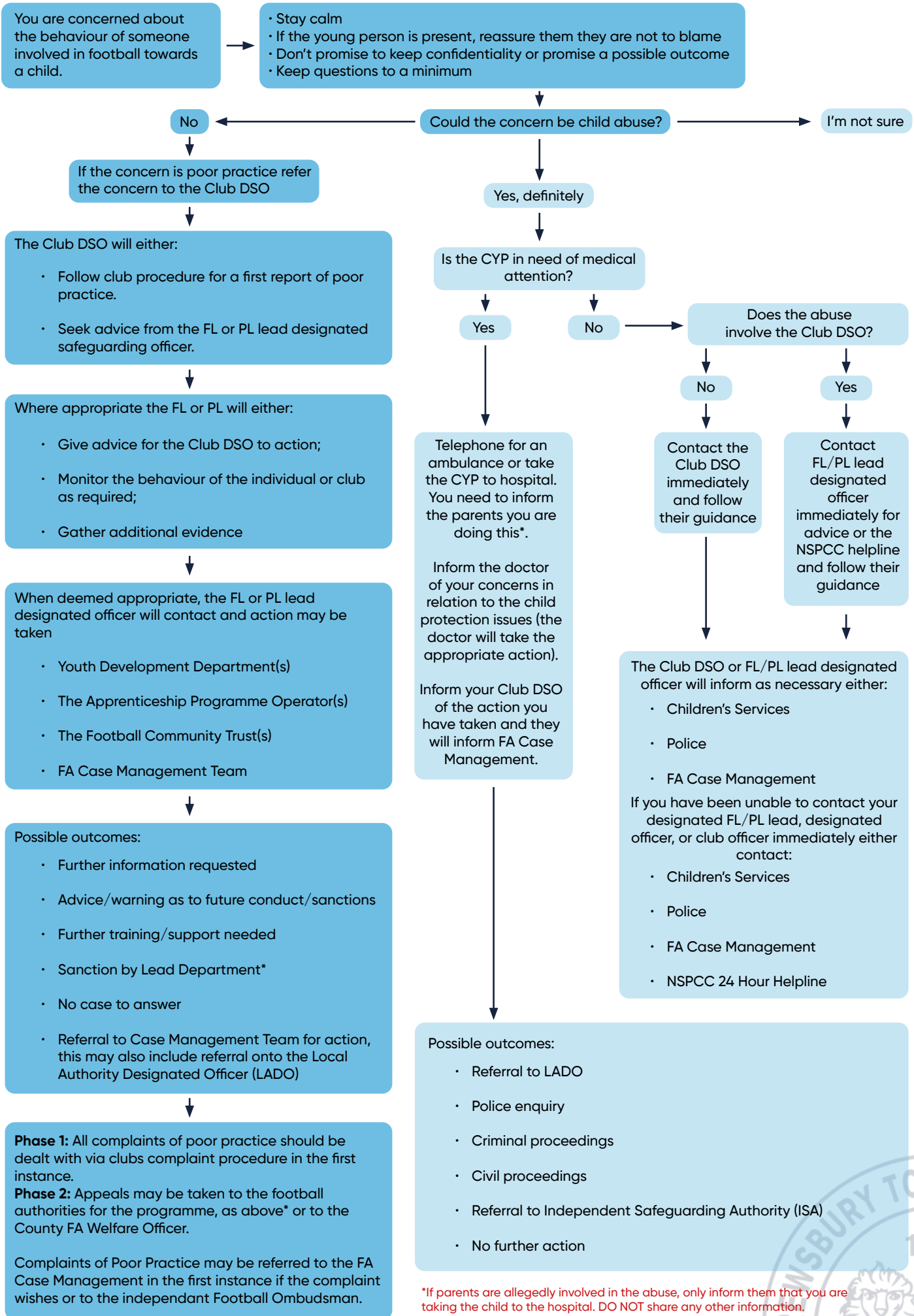
Designated Safeguarding Officer:

Signed:

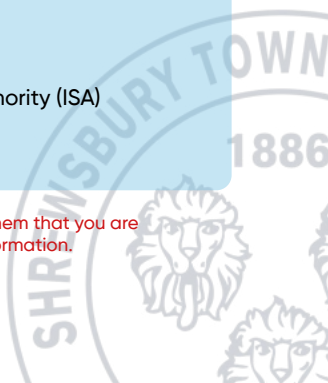
Date:

Further action taken:





*If parents are allegedly involved in the abuse, only inform them that you are taking the child to the hospital. DO NOT share any other information.



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Drafted By:	John Rhodes
Signed off by:	Liam Dooley
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Next review date:	May 2025

